

## **REMARKS**

### **INTRODUCTORY COMMENTS**

The outstanding Office Action dated March 17, 2008 has been duly received and its contents carefully considered. The following remarks and above amendments are believed to be fully responsive to the outstanding Office Action, when coupled with the above amendments, to render all claims patentable.

Claims 1-20 are pending in this application. By this Amendment, Applicant has amended claims 1, 3-7, 10, 12, 16 and 19 to more particularly set forth the application without introducing any new matter therein. Additionally, claim 2 has been canceled without prejudice or disclaimer in favor of incorporating the subject matter contained therein into amended claim 1.

### **CLAIM OBJECTIONS**

Claims 1, 4-7, 10 and 16 are objected to as containing certain informalities.

In response, claims 1, 4-7, 10 and 16 have been amended to address the issues raised by the Examiner.

### **CLAIM REJECTIONS UNDER 35 U.S.C. § 112**

Claim 4 is rejected under 35 U.S.C. § 112, second paragraph, as being indefinite.

Claim 4 has been amended to address the issue raised by the Examiner. Support thereof can be found, e.g., on page 2, lines 12-15 of the specification.

**CLAIM REJECTIONS UNDER 35 U.S.C. § 102**

Claims 1-9 and 16-20 are rejected under 35 U.S.C. §102(b) as being anticipated by *Randmae* (U.S. Patent No. 5,032,919). Applicant respectfully traverses the rejection for as least the reasons stated below:

With respect to amended claim 1 from which claims 2-9 directly or indirectly depend, it now recites an imaging module that has a lens holder holding a lens; a foot holding an image sensor chip; and a detachable locking structure for fixing a mutual position of the lens holder and the foot with respect to each other in at least one direction, wherein the locking structure allows the foot to slide alone an inner surface of the lens holder while preventing any rotation of the foot with respect to the lens holder, and wherein **the locking structure utilizes a snap connection between the lens holder and the foot.**

Applicant respectfully submits that *Randmae* is deficient with respect to at least one feature or limitation as currently set forth in amended claim 1. Specifically, Applicant respectfully asserts that *Randmae* does not teach or reasonably suggest at least **the locking structure 37, 55 utilizes a snap connection between the lens holder 50 and the foot 30** as emphasized above.

Referring to Fig. 5 and column 3, lines 3-61 of *Randmae*, the cam followers 42 is pushed through the T-shaped opening 60 in the front panel 14, and then enters the slots 46 and rides on the cam surfaces 44. In other words, the followers 42 just pass through the opening 60. Obviously, no snap connection between the lens mount 16 and the carrier 22 is disclosed. Therefore, claim 1 as amended cannot be anticipated by *Randmae*, and Applicant respectfully asserts that it is in condition for allowance.

Since claims 2-9 are dependent claims that incorporate the limitations of amended claim 1, Applicant respectfully asserts that these claims are also in condition for allowance. Additionally, these claims recite other limitations that can sever as an independent basis for patentability.

With respect to amended claim 16 from which claims 17-20 depend, it now recites an imaging module which has a lens holder holding a lens; a foot holding an image sensor chip; a locking structure for fixing a mutual position of the lens holder and the foot with respect to each other in at least one direction while allowing movement in an axial direction; and a coupling structure comprising a flange on the foot as well as **another flange on the lens holder**, wherein the lens holder and the foot are connected by a snap connection, wherein both of the flanges comprise a contact surface, and wherein the contact surfaces abut against each other when the lens is at a maximum axial distance from the image sensor chip.

In the rejection of claim 16, the Examiner asserts that *Randmae* teaches or suggests all of characteristics in claim 16. Applicant respectfully disagrees. The Examiner takes the lens mount 16 of *Randmae* to be the lens holder 50 of claim 16, and the ramp surfaces 44 of *Randmae* to be the flange 52 of claim 16. In *Randmae*, however, the ramp surface 44 (the flange) is not provided on the lens mount 16 (the lens holder). Therefore, claim 16 as amended cannot be anticipated by *Randmae*. Applicant respectfully asserts that claim 16 as amended is in condition for allowance.

Since claims 17-20 are dependent claims that incorporate the limitations of claim 16, Applicant respectfully asserts that these claims are also in condition for allowance. Additionally, these claims recite other limitations that can serve as an independent basis for patentability.

#### **CLAIM REJECTIONS UNDER 35 U.S.C. § 103**

Claims 10-15 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Randmae*. Applicant respectfully traverses this rejection for at least the reasons stated below.

With respect to amended claim 10, it recites a mobile phone which has a lens holder holding a lens; a foot holding an image sensor chip; and a locking structure for fixing a mutual position of the lens holder and the foot with respect to each other in at least one direction while allowing

movement in an axial direction, wherein the lens holder has a wall and a base defining an inner volume, wherein the base has an opening therethrough, and wherein the lens is positioned in the inner volume of the lens holder against the base and adjacent to the opening, and wherein **the locking structure utilizes a snap connection between the lens holder and the foot.**

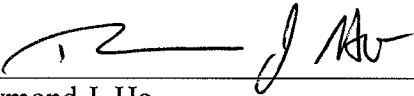
Applicant respectfully asserts that *Randmae* is deficient with respect to at least one feature or limitation as currently set forth in amended claim 10. Specifically, Applicant respectfully asserts that *Randmae* does not teach or reasonably suggest **the locking structure (37, 55) utilizes a snap connection between the lens holder (50) and the foot (30)** as emphasized above.

Referring to Fig. 5 and column 3, lines 3-61 of *Randmae*, the cam followers 42 is pushed through the T-shaped opening 60 in the front panel 14, and then enters the slots 46 and rides on the cam surfaces 44. That is to say, the followers 42 just pass through the opening 60. Obviously, no snap connection between the lens mount 16 and the carrier 22 is disclosed. Therefore, claim 10 as amended is not obvious over *Randmae*, and Applicant respectfully asserts that claim 10 as amended is in condition for allowance.

Since claims 11-15 are dependent claims that incorporate the limitations of claim 10, Applicant respectfully asserts that these claims are also in condition for allowance. Additionally, these claims recite other limitations that can serve as an independent basis for patentability.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Respectfully submitted,

By 

Raymond J. Ho

Registration No.: 41,838

VENABLE LLP

P.O. Box 34385

Washington, DC 20043-9998

(202) 344-4000

(202) 344-8300 (Fax)

Attorney/Agent For Applicant

DC2DOCS1-#963366-v2-Amendment.DOC